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*Counsel to the Official Committee of
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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:	:	Chapter 11
	:	
PURDUE PHARMA L.P., <i>et al.</i> ,	:	Case No. 19-23649 (RDD)
	:	
Debtors. ¹	:	(Jointly Administered)
	:	

**MOTION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
FOR LEAVE TO EXCEED PAGE LIMIT IN STATEMENT IN SUPPORT OF
CONFIRMATION OF THE SIXTH AMENDED JOINT CHAPTER 11
PLAN OF REORGANIZATION OF PURDUE PHARMA
L.P. AND ITS AFFILIATED DEBTORS**

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014).

The Official Committee of Unsecured Creditors (the “Official Committee”)² appointed in the chapter 11 cases (the “Chapter 11 Cases”) of the above-captioned debtors and debtors in possession (collectively, the “Debtors”), by and through its undersigned counsel, respectfully represents as follows.

1. Contemporaneously herewith, the Official Committee is filing a statement (the “UCC Statement”) in support of confirmation of the *Sixth Amended Joint Chapter 11 Plan of Reorganization of Purdue Pharma L.P. and its Affiliated Debtors* [ECF No. 3185] (the “Plan”).

2. Paragraph 15 of the *Second Amended Order Establishing Certain Notice, Case Management, and Administrative Procedures*, dated November 18, 2019 [ECF No. 498] (the “CMO”) provides that “motions, applications and objections are limited to 40 pages and replies and statements are limited to 20 pages.” CMO Ex. 1 ¶ 15.

3. By the UCC Statement, the Official Committee intends to assist the Court in making the determinations it is required to make in connection with confirmation of the Plan. In this context, and in light of the Official Committee’s critical role in these cases, the UCC Statement responds in detail to issues raised in certain objections to confirmation of the Plan, which collectively total hundreds of pages more than the 40 pages that would be permitted to any single objection under the CMO. The Official Committee respectfully submits that this represents sufficient cause for relief from the page limits that would otherwise apply to the UCC Statement under the CMO.

² The Official Committee was appointed by the United States Trustee at the beginning of these Chapter 11 Cases to serve as a fiduciary for the interests of all unsecured creditors, and comprises the following nine members (i) The Blue Cross and Blue Shield Association (co-chair), (ii) CVS Caremark Part D Services L.L.C. and CaremarkPCS Health L.L.C., (iii) Cheryl Juare, (iv) Kara Trainor, (v) LTS Lohmann Therapy Systems Corporation, (vi) Pension Benefit Guaranty Corporation, (vii) Ryan Hampton (co-chair), (viii) Walter Lee Salmons, and (ix) West Boca Medical Center, plus three *ex officio* members, (a) Cameron County, Texas, on behalf of the Multi-State Governmental Entities Group, (b) the Cheyenne and Arapaho Tribes, on behalf of certain Native American Tribes and Native American-affiliated creditors and (c) Thornton Township High School District 205, on behalf of certain public school districts.

4. The Official Committee therefore respectfully submits that that the Court enter an order, substantially in the form attached hereto as **Exhibit A**, granting the Official Committee relief from the page limits imposed by the CMO.

Dated: New York, New York

AKIN GUMP STRAUSS HAUER & FELD LLP

August 5, 2021

By: /s/ Arik Preis

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*Counsel to the Official Committee of Unsecured
Creditors of Purdue Pharma L.P., et al.*

Exhibit A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:	:	Chapter 11
	:	
PURDUE PHARMA L.P., <i>et al.</i> ,	:	Case No. 19-23649 (RDD)
	:	
Debtors. ³	:	(Jointly Administered)
	:	

**ORDER GRANTING LEAVE TO THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS TO EXCEED PAGE LIMIT IN STATEMENT IN SUPPORT OF
CONFIRMATION OF THE SIXTH AMENDED JOINT CHAPTER 11
PLAN OF REORGANIZATION OF PURDUE PHARMA
L.P. AND ITS AFFILIATED DEBTORS**

Upon the motion, dated August 5, 2021 of the Official Committee of Unsecured Creditors (the “Official Committee”) appointed in the chapter 11 cases (the “Chapter 11 Cases”) of the above-captioned debtors and debtors in possession (collectively, the “Debtors”) for an order granting relief from the page limit in the Official Committee’s statement (the “UCC Statement”) in support of confirmation of the *Sixth Amended Joint Chapter 11 Plan of Reorganization of Purdue Pharma L.P. and its Affiliated Debtors* [ECF No. 3185], and the Court having found that the Official Committee has demonstrated good cause to grant relief from the page limit that otherwise would apply to the UCC Statement under the *Second Amended Order Establishing Certain Notice, Case Management, and Administrative Procedures*, it is hereby ORDERED, ADJUDGED AND DECREED that the Official Committee may exceed the page limit imposed

³ The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014).

by the CMO and may file the UCC Statement at 56 pages in length, exclusive of the table of contents and table of authorities.

Dated: White Plains, New York
August __, 2021

THE HONORABLE ROBERT D. DRAIN
UNITED STATES BANKRUPTCY JUDGE